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Attorneys for Vizio, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SONY CORPORATION.

Plaintiff.

v.

VIZIO, INC..

Defendant.

Case No. 08-01135 (RGK)(FMOx)

DISCOVERY MATTER

**DECLARATION OF STEVEN J.
CORR IN SUPPORT OF THE JOINT
STIPULATION REGARDING
VIZIO, INC.'S MOTION TO
COMPEL EXPERT REPORTS AND
DEPOSITIONS, AND TO COMPEL
DEPOSITIONS OF SONY
WITNESSES IN THE UNITED
STATES**

Date: September 2, 2009
Time: 10:00 A.M.
Judge: Hon. Fernando M. Olguin
Courtroom: 9th Floor, Courtroom F

1 I, Steven J. Corr, declare as follows:

2 1. I am an associate with Jones Day, counsel of record for Defendant
3 Vizio, Inc. (“Vizio”) in this action. I make this declaration in support of the Joint
4 Stipulation Regarding Vizio, Inc.’s Motion to Compel Expert Reports and
5 Depositions and Depositions of Sony Witnesses in the United States. The
6 following is based on my personal knowledge and, if called as a witness, I could
7 and would competently testify thereto.

8 2. Exhibit 1 is a true and correct copy of a letter from Ryan McCrum to
9 Todd Kennedy sent on July 8, 2009.

10 3. Exhibit 2 is a true and correct copy of a letter from Todd Kennedy to
11 Ryan McCrum sent on July 16, 2009.

12 4. Exhibit 3 is a true and correct copy of the July 17, 2009 Meet and
13 Confer Transcript recording the meet and confer between counsel for Vizio and
14 Sony Corporation (“Sony”) regarding Sony’s discovery responses.

15 5. Exhibit 4 is a true and correct copy of a letter from Ryan McCrum to
16 Todd Kennedy sent on July 21, 2009.

17 6. Exhibit 5 is a true and correct copy of a letter from Todd Kennedy to
18 Ryan McCrum sent on July 22, 2009.

19 7. Exhibit 6 is a true and correct copy of a letter from Steven Corr to Peter
20 Klivans sent on June 9, 2009.

21 8. Exhibit 7 is a true and correct copy of a letter from Peter Klivans to
22 Steven Corr sent on June 19, 2009.

23 9. Exhibit 8 is a true and correct copy of a letter from Joesph Milowic III
24 to Steven Corr sent on July 24, 2009.

25 10. Exhibit 9 is a true and correct copy of Discovery Special Master’s
26 Order No. 4: Joint Motion Re Expert Discovery from *In re: Katz Interactive Call*
27 *Processing Litigation*, Case No. 07-ML-1816.

11. Exhibit 10 is a true and correct copy of Defendants' Brief in Support of Their Motion to Transfer This Action to the Central District of California Pursuant to 28 U.S.C. § 1404(a) from *Vizio, Inc. v. Sony Corp. and Sony Corp. of America*, Case No. 08-5029.

12. Exhibit 11 is a true and correct copy of the Order for Jury Trial entered by the Court on April 6, 2009.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: August 12, 2009 JONES DAY

By: /s/ Steven J. Corr
Steven J. Corr

Attorneys for Defendant Vizio, Inc.